

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

HOLCOMBE, et. al,

Plaintiffs

vs.

UNITED STATES OF  
AMERICA,

Defendant

NO. 5:18-CV-00555-XR

(consolidated cases)

**PLAINTIFFS' MOTION**

Please take notice that Plaintiffs intend take the oral and videotaped deposition of [NAME]. Pursuant to local, statewide, and national emergency orders related to the ongoing COVID-19 pandemic, the deposition will occur virtually with all parties attending via remote deposition technology provided by Res Ipsa. Secure links will be provided via email by Res Ipsa. The deposition will be recorded stenographically and may be digitally video recorded. The court reporter and videographer are being provided through Res Ipsa, 501 Congress Avenue, Suite 150, Austin, Texas 78701, email: [depos@res-ipsa.com](mailto:depos@res-ipsa.com). The court reporter that swears in the witness remotely will do a statement on the record saying that all parties agree and stipulate to the remote deposition and the remote swearing of the witness. The deposition, when so taken and returned according to law, may be used in evidence at the trial of this case.

The deposition will be held on [DATE] at [TIME] and will be conducted remotely by Res Ipsa, with the witness and all parties in their preferred respective locations.

You are invited to attend and participate as you deem appropriate. The deposition will take place from day to day until complete.

Respectfully Submitted,

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## **CERTIFICATE OF SERVICE**

By our signatures above, we certify that a copy of Plaintiffs' Motion has been sent to the following on April 23, 2020 via the Court's CM/ECF notice system.

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